

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

ALAN GOLDMAN,

Plaintiff

v.

MCCONNELL VALDES, LLC;
ANTONIO A. ARIAS-LARCADA, his wife
MRS. ARIAS, and the Conjugal Partnership
composed by them;
JOSE IRIZARRY-CASTRO;
JOHN DOE; MARY DOE
UNKNOWN INSURANCE COMPANY;

Defendants

CIVIL NO.: 24cv01136(SCC)

**MOTION FOR EXTENSION OF TIME TO ANSWER INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

TO THE HONORABLE COURT:

NOW APPEAR co-defendants Antonio Arias Larcada, his wife Maria Beale, and the Conjugal Partnership constituted between them, and McConnell Valdés, LLC., through their undersigned counsel, and very respectfully state and pray as follows:

1. On January 24, 2024, the appearing parties were served with a set of Interrogatories, Request for Production of Documents and Request for Admissions by plaintiff Alan B. Goldman (See, Docket No. 77). Under the Federal Rules of Civil Procedure, the answers are due by today, February 24, 2025.
2. The appearing parties have been working diligently to respond to these discovery requests and have already answered the Requests for Admissions.

However, due to unforeseen circumstances, including other professional commitments and the undersigned's recent and unexpected illness, they require an extension of time of thirty (30) days, up to and including March 26, 2025, to complete the document production and to respond to the interrogatories.

3. The present request is made in good faith and is not meant to obstruct or delay these proceedings.

WHEREFORE, it is very respectfully requested that this Honorable Court grant the appearing defendants an additional period of time, up to and including March 26, 2025, to submit their answers to the referenced interrogatories and requests for production of documents.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 24th day of February, 2025.

I HEREBY CERTIFY that on February 24, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all the counsel of record.

S/Manuel San Juan
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